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THESE UNITED STATES  
THE MIDDLE DISTRICT OF  
ALABAMA

RECEIVED

3-14-07

Jeffery Todd Gould #140977  
Plaintiff,

V. MIDDLE DISTRICT COURT  
MIDDLE DISTRICT ALA

CIVIL ACTION # 205-05  
-CV-1102-F

DONALD McARTHUR, PA-C, -  
- Et AL.,

MOTION TO AMEND FOR COMPENSATORY AND PUNITIVE -  
- DAMAGES

NOW COMES PLAINTIFF, Jeffery Gould PRO SE IN THE ABOVE  
STYLED CAUSE: AND STATES THE FOLLOWING!

STATED CLAIM. I.E.

1. Health Service's Defendant's PHS Et AL., HAS KNOWN OF  
Jeffery Gould's 140977 HEPATITIS C. VIRUS AND COMPLETE  
Blood Count (CBC) INDICATION STATED THAT MY Hemoglobin  
AND Platelet counts WERE too low for safe treatment.

STATEMENT OF CLAIM.

2. I Jeffery Gould #140977 STATE! THAT SAID DEFENDANT  
HAVE KNOWN SINCE ON OR ABOUT 4-26-05 OF PLAINTIFFS  
HEPATITIS C. VIRUSES INFECTION AND OF (COMPLETE Blood  
Count) OF Hemoglobin; AND Platelet Count WERE too low  
for safe treatments with Ribavirin/ ~~PER~~ INTERFERON. COMBI-  
-NATION Therapy. I.E low Blood Platelet counts: SINCE ON OR ABOUT  
4-26-05

Page 2  
of  
Motion  
to  
AMEND,

Civil ACTION No. 2:05-5 -CV-1102-F

3-14-07

#### STATEMENT of CLAIM

3. Specifically, low Blood Platelets OVER A Period of TIME CAN CAUSE (LEUKEMIA) i.e. INFORMATION GLEANED FROM DORLAND'S ILLUSTRATED Medical Dictionary - 27th edition LEUKEMIA IN WHICH THE TOTAL WHITE CELL Blood count in The peripheral Blood is below NORMAL ET AL. ANY AND ALL other INFORMATION PERTAINING TO LEUKEMIA CHARACTERIZED IN SAID Medical Dictionary's

#### STATEMENT of CLAIM

4. I HAVE BEEN CLASSIFIED ANEMIC SINCE ON OR ABOUT 4-26-05 (ANEMIA) CHARACTERIZED IN ABOVE STYLED DICTIONARY PAGE 76 i.e. A REDUCTION below NORMAL in the number of erythrocytes PER CU. MM., in the quantity of Hemoglobin, or in the volume of PACKED Red Blood cells per 100 ml. of Blood which OCCURS WHEN the equilibrium between Blood loss (Through Bleeding or Destruction) AND Blood production is disturbed. Page 77 Hemolytic A., ANEMIA in which shortened Red cell survival is ASSOCIATED WITH UNSTABLE Hemoglobin's

#### STATEMENT of CLAIM'S SPECIFIED

5. ET AL. Along with ALL other CLAIM'S! I HAVE BEEN RENDERED AND GOVERNED by deliberate indifference to My Medical needs AND REQUEST: A detailed SPECIFICATION AND factual DESCRIPTION: follows to justify PUNITIVE AND OR COMPENSATORY DAMAGE'S I AM CHRONIC CARE IN MATE

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Civil Action No. 2:05-CV-01102-F  
CONCLUSION of Motion to AMEND

RECEIVED for COMPENSATORY & PUNITIVE DAMAGES 3-14-07

2007 MAR 21 A 10:08

DAMAGES

ALBA P. HACKETT, CLERK  
U.S. DISTRICT COURT  
MIDDLE DISTRICT OF FLORIDA

STATEMENT of CLAIMS AND facts

5. CONTINUED from PAGE 2. PRETAINING to TREATMENT AS A WARD of the STATE by AND THROUGH P.H.S & AL. A LICENSED PHYSICIAN DONALD MCARTHUR STATED ON 3-2-06 before a Notary Public AND being duly SWORN, AND SAYS ON OATH: DOCUMENT 8-2 Filed 3-2-06 THAT ON NOVEMBER 9, 2004 i.e. Mr. Gould WAS EVALUATED for ELIGIBILITY to RECEIVE Ribavirin/INTERFERON TREATMENTS for HIS HEPATITIS C. Mr. Gould i.e. didn't qualify for treatment BECAUSE his (CBC) hemoglobin AND Platelet counts WERE too low for SAFE TREATMENT. i.e. 11-9-04. I believe THAT (STATEMENT of CLAIM) SINCE 3-2-06 Till PRESENT 3-14-07 my life AND or Health HAS BEEN IN DANGER: BECAUSE of my complete blood count, (CBC) BEING too low! AND THAT SPECIFICALLY DONALD MCARTHUR, -PA-C, AND ET AL P.H.S AND it's EMPLOYEES WHO HAVE EVALUATED my (CBC) HAVE ACTED WITH INDIFFERENCE too my NEED to HAVE (CBC) brought up too A APPROPRIATE level for my OVER ALL Health AND well being: Similarly P.H.S ET AL., HAS NOT EXERCISED positive diligence in Medical Terms about PERSCRIPTIONED MEDICATIONS i.e. PERSCRIBED MED'S HAVE NOT BEEN AVAILABLE for continued AMOUNTS of days AND WEEKS. PERSCRIPTIONED MED'S HAVE HAD to be REPER-SCRIBED, i.e. for A CHRONIC problem without NOTICE

Summary Civil Action No. 2:05-05-  
CONCLUSION CV-1102-F  
Endorsed by Jeffery Gould (of Motion to AMEND) 3-14-07

CONTINUED (STATEMENT OF CLAIMS)

I HAVE BEEN HOSPITALIZED ON NUMEROUS OCCASIONS ON APR 2 ABOUT 1-17-06 I WAS AIDED BY A FELLOW PRISONER TO THE NURSES STATION AND WAS FORWARDED TO (BAPTIST EAST HOSPITAL) I WAS TOLD BY A NURSE THERE THAT I WAS AT THE POINT OF DEATH WHEN I ARRIVED. MY POTASSIUM WAS FAR FROM A SAFE LEVEL I WAS TOLD THAT AMONG OTHER THINGS HEALTH WISE POTASSIUM AIDES IN HEART BEAT REGULATION I WAS IN SAID HOSPITAL FOUR OR FIVE DAYS AND KILBY'S INFIRMARY FOR ABOUT TEN DAYS TO THE BEST OF MY MEMORY: (STATEMENT OF CLAIM AND RELIEF SOUGHT)

IN THIS CIVIL ACTION IE I HAVE HAD MEDICATION'S DISCONTINUED SUCH AS POTASSIUM FROM MEGA DOSES! TO ZERO!

ENSURE LIQUID VITAMEN'S WENT FROM 3 A DAY TO 1 A DAY AND NOW HAVE BEEN D.C.ED FOR THIS PRISON. DETAILED INDIFFERANT DECISION'S., (A DETERMINATION OF DELIBERATE INDIFFERENCE DOES NOT REQUIRE PROOF OF INTENT, TO HARM, OR A DETAILED INQUIRY OF (DEFENDANTS) STATE OF MIND. THE FACTS ESTABLISH THAT IE. JEFFERY TODD GOULD #140977 HAS AND IS BEING TREATED DELIBERATELY INDIFFERANT.

WELLMAN V. FAULKNER 715 F.2d 269, 273 (7th Cir. 1983) THERE ARE ALSO MANY DECISIONS: THAT SAY IN EFFECT THAT NOT EVERY JUDGEMENT BY A DOCTOR IS A MEDICALLY PROFESSIONAL JUDGEMENT: SEE, EG.) HUGHES V. JULIET PRISON 931 F.2d

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CASE number

2:05-05  
-CV-1102FCONTINUED  
CONCLUSION

Endorsed by

Jeffery Gould  
#140977of Motion to AMEND

3-14-07

for COMPENSATORY AND or PUNITIVE DAMAGES

(STATEMENT'S CLAIM'S

AND RELIEF Sought)

INCLUDED IS MY latest effort to obtain competent medical treatment., That is adequate to my serious needs: (CASES of this nature involve conditions often leading to Death disability or disfigurement. Waldrop v. Evans 871 F.2d 1030, 1032 -36 (11th Cir.) 880 F.2d 421 (11th Cir. 1989)

(RELIEF Sought)

COMPENSATORY AND or PUNITIVE DAMAGES., IN THE AMOUNT of \$300,000 (Three Hundred - Thousand Dollars). i.e. Et. AL., PERTAINING to CASE LAW'S THAT HAVE BEEN RECITED., IN THIS CIVIL ACTION 2:05-05-CV-1102F) I HAVE MEET ALL REQUIREMENTS THAT I AM OF KNOWLEDGE OF., (to RECEIVE ADEQUATE MEDICAL TREATMENTS for (HEPATITIS C) AND to HAVE MY (CBC) of Hemoglobin AND Blood PLATELET'S brought up to a safe level IS (THE RELIEF I AM SEEKING) (I AM INCLOSING to THIS Motion to AMEND) AND (RELIEF Sought) THE up to date RESPONSE of P.H.S Et. AL. AND THE EMPLOYEE'S of SAID P.H.S ENVOLED WITH MY MEDICAL CONDITIONS. A WRITTEN REPLY to my P.H.S inc. SICK CALL REQUEST: to THIS COURT to be USED AS

(EVIDENCE) IN THIS CASE - 2:05-05-CV-1102F Motion to AMEND in ABOVE STYLE MANNER. Jeffery Gould

CONCLUSION  
of

(MOTION TO AMEND for COMPENSATORY AND OR PUNITIVE DAMAGES) CIVIL ACTION \*2:05-05-CV-1102 F 3-14-07

ANY AND ALL STATEMENTS MADE IN THIS MOTION, ARE SWORN TO BY, Jeffery Todd Gould A/S. 140977

Endorsed by Jeffery Gould

To This Court, I ALSO wish it to be KNOWN That on This Date 3-14-07 I CONSTITUTE AND CLAIM AS (BENEFICIARIES) TO THE MONIES., INVOLVED IN THIS MOTION TO AMEND, for COMPENSATORY AND OR PUNITIVE DAMAGES: CIVIL ACTION #2:05-05-CV-1102 F FOR THE AMOUNT of, \$300,000 THREE-Hundred THOUSAND DOLLAR'S., TO My Mother BONNIE TURNER MONIES IN THE AMOUNT of, \$100,000 ONE HUNDRED THOUSAND DOLLAR'S) if I Should become of UNSOUND MIND or if I PERISH DURING This litigation)

Endorsed by Jeffery Gould A/S 140977

ALSO AS described in ABOVE STYLED MANNER:

I CONSTITUTE AS BENEFICIARIES: WILLIAM B TURNER My Step father I BEQUEST MONIES i.e. IN THE AMOUNT of ONE HUNDRED THOUSAND DOLLARS., \$100.000

AND LAST but NOT LEAST! My GREAT Niece LAYLA PARDUE

I Jeffery Gould CONSTITUTE AND BEQUEST MONIES from THIS CIVIL ACTION 2:05-05-CV-1102 F TO be OBTAINABLE WHEN LAYLA PARDUE BECOMES 18 YRS old

ALONG WITH INTEREST EARNED PERTAINING TO SAID MONIES:

ALL STATED ACTIONS ABOVE Endorsed by Jeffery Todd Gould

CERTIFICATE of SERVICE

I Jeffery Todd Gould AIS #140977 HAVE PLACED IN  
THE legal MAIL BOX AT STATON PRISON A Motion to  
AMEND for COMPENSATORY AND or PUNITIVE DAMAGES  
IN The foregoing mail properly Addressed AND Dated  
ON THIS 17<sup>th</sup> DAY of MARCH 2007  
(To the)

Office of the CLERK., for These UNITED STATES,

DISTRICT COURT., P.O. BOX 711 MONTGOMERY, AL.  
-ALABAMA 36101-071

(AND to)

THE DEFENDANT'S LAWYER'S., RUSHTON, STAKELY, JOHNSON,

AND GARRETT, P.A. ATTORNEYS AT LAW 184 COMMERCE

Street P.O. Box 270 MONTGOMERY Alabama 36101-0270

ENDORSED AND SIGNED  AIS 140977

---

Jeffery Gould #140977  
P.O. Box 56  
Elmore, AL. 36025



CHRONIC CARE  
Hepatitis C.

your copy!  
WARDEN Fornis  
1 of 4  
1. Warden Fornis  
2. Captain Edward  
3. Dr Corbier  
4. copies retained  
by ie Jeff Gould



**PRISON HEALTH SERVICES, INC.  
SICK CALL REQUEST**

Print Name: Jeffery Gould Date of Request: 3-12-07  
ID # 140977 Date of Birth: 11-6-63 Location: E-2-1A  
Nature of problem or request: Blood Platelets AND Hemoglobin counts are too low AND Appropriate treatments HAVE BEEN DENIED SINCE 4-26-05  
it on this day 3-12-07 I AM ONCE AGAIN ASKING for Appropriate Med-  
ical treatments of above described problems AND A liver Biopsy.  
if your Reply is Negative A Reply in writing so I might understand is  
formally Requested

Signature Jeffery Gould

**DO NOT WRITE BELOW THIS LINE**

Date:    /   /     
Time:     AM PM  
Allergies:    

<p align="center"><b>RECEIVED</b></p> <p>Date: _____</p> <p>Time: _____</p> <p>Receiving Nurse Initials _____</p>
---

**(S)ubjective:**

**(O)bjective** (V/S): T: \_\_\_\_\_ P: \_\_\_\_\_ R: \_\_\_\_\_ BP: \_\_\_\_\_ WT: \_\_\_\_\_

**(A)ssessment:**

Inmate is not a good candidate  
for liver biopsy due to low  
platelet level. Platelets + Hct is  
not low enough for blood transfusion.

**(P)lan:**

Inmate ~~not~~ does not meet the  
standards for Hep. C treatment. He  
has been informed of all of the  
above.

Refer to: MD/PA Mental Health Dental Daily Treatment Return to Clinic PRN  
CIRCLE ONE

Check One: ROUTINE ( ) EMERGENCY ( )  
If Emergency was PHS supervisor notified: Yes ( ) No ( )  
Was MD/PA on call notified: Yes ( ) No ( )

m. Sign HSA  
3/14/07

EGR  
3/14/07

**SIGNATURE AND TITLE**

WHITE: INMATES MEDICAL FILE  
YELLOW: INMATE RETAINS COPY AFTER NURSE INITIALS RECEIPT



*Legal Mail*

9577

Jeffery Todd Gould  
A/S 140977  
Station Correctional Facility  
P.O. Box 56  
Elmore, AL 36025

2:05cv1102-mef

State of Alabama  
Central Mail Ops  
#4



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